

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

MESHA GERKEN, BRENDAN STARKEY  
and HEATHER STARKEY,

Plaintiffs,

v.

Cause No. 1:19-cv-00860-WJ-SCY

DOMENIC CHARLES MILES and  
PROGRESSIVE DIRECT INSURANCE COMPANY,  
d/b/a PROGRESSIVE NORTHERN INSURANCE COMPANY,

Defendants.

**DEFENDANT DOMENIC CHARLES MILES' NOTICE  
OF COMPLETION OF BRIEFING**

Defendant DOMENIC CHARLES MILES, by and through his attorneys, DEGRAAUW LAW FIRM, P.C. (J. Andrew deGraauw and Bryan M. Rowland), hereby notifies the Court that briefing is complete on its Motion to Dismiss Plaintiffs, Brendan Starkey and Heather Starkey's Complaint Due to Violation of the Applicable Statute of Limitations as follows:

<b><u>Doc. Number</u></b>	<b><u>Date Filed</u></b>	<b><u>Title</u></b>
4	9/25/19	<b>MOTION to Dismiss <i>Plaintiffs, Brendan Starkey and Heather Starkey's Complaint Due to Violation of the Applicable Statute of Limitations</i> by Domenic Charles Miles</b>
11	10/10/19	<b>NOTICE of Briefing Complete by Domenic Charles Miles re [4] MOTION to Dismiss <i>Plaintiffs, Brendan Starkey and Heather Starkey's Complaint Due to Violation of the Applicable Statute of Limitations</i> filed by Domenic Charles Miles</b>

13	10/10/19	<b><i>UNTIMELY RESPONSE in Opposition re [4] MOTION to Dismiss <i>Plaintiffs, Brendan Starkey and Heather Starkey's Complaint Due to Violation of the Applicable Statute of Limitations</i> filed by Mesha L. Gerken, Brendan Starkey, Heather Starkey</i></b>
20	10/24/19	<b><i>REPLY to Response to Motion re [4] MOTION to Dismiss <i>Plaintiffs, Brendan Starkey and Heather Starkey's Complaint Due to Violation of the Applicable Statute of Limitations</i> filed by Domenic Charles Miles</i></b>

Respectfully submitted,

**DEGRAAUW LAW FIRM, P.C.**

By: /s/ ***Bryan M. Rowland***  
J. Andrew deGraauw  
Bryan M. Rowland  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2019, I filed the foregoing pleading electronically through the CM/ECF, which caused all parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

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/s/ **Bryan M. Rowland**

J. Andrew deGraauw  
Bryan M. Rowland